JOHN WAIHEE



VUKIO NAITO
CHARMAN

JOHN P. SPIERLING
COMMISSIONER

DENNIS R. YAMADA

STATE OF HAWAII
PUBLIC UTILITIES COMMISSION
DEPARTMENT OF BUDGET AND FINANCE

465 S. KING STREET, #103 HONOLULU HAWAII 96813

August 5, 1994

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ACCIMAL ROOM

PR File no. 94-SPI

Federal Communications Commission Office of the Secretary 1919 M Street, Room 222 Washington, D.C. 20554

#### **Dear Commissioners:**

Enclosed please find the original and four copies of the petition of the Public Utilities Commission, State of Hawaii, for authority to extend its rate regulation of commercial mobile radio services in the State of Hawaii. The petition is submitted pursuant to Sections 3(n) and 332 of the Communications Act of 1934, as amended by the Omnibus Budget Reconciliation Act of 1993, and 59 FR 18493, Section 20.13.

The petition is accompanied by the following attachments and exhibits:

- Notarized statement of Mr. Milton Higa, Administrative Director, Public Utilities Commission, State of Hawaii (State);
- 2. Certification by Mr. Milton Higa that Petitioner is the duly authorized state agency responsible for the regulation of telecommunication services provided in the State;
- 3. Attachment 1: "Financial Conditions of Cellular Companies Operating in the State of Hawaii";
- 4. Attachment 2: "Financial Conditions of Radio Common Carriers Operating in the State of Hawaii";
- 5. Attachment 3:

GTE Mobilnet of Hawaii, Inc., PUC Tariff No. 1, "Retail Cellular Telecommunications Service";

USCOC of Hawaii 3, Inc. dba United States Cellular, USCOC Tariff No. 1, "Cellular Telephone Services";

Maui Cellular Telephone Company, Inc. dba Cellular One, MCTC Tariff No. 1, "Cellular Telephone Services";

Honolulu Cellular Telephone Company, PUC Tariff No. 1A, "Cellular Telephone Service";

Cybertel Corporation, dba Cybertel Cellular, CC Tariff No. 1, "Cellular Telephone Services";

Island Radio-Phone, Dr. Mark Goldman, PUC Tariff No. 1;

Ram Paging Hawaii, PUC Tariff No. 2, "City & Counties Rate Schedules"; and

General Telcourier, Inc., "Rates";

- 6. Attachment 4: Petitioner's proposal of "Standards for Commercial Mobile Radio Service in the State of Hawaii."
- 7. Exhibits A-1 through A-8:

Exhibit A-1:

GTE Mobilnet, Inc.-Hilo, Maui, Oahu, and Kauai Operations;

Exhibit A-2: USCOC of Hawaii 3, Inc.-Island of Hawaii;

Exhibit A-3: Maui Cellular Telephone Company;

Exhibit A-4: Honolulu Cellular Company, A General Partnership;

Exhibit A-5: Cybertel Cellular-Kauai;

Exhibit A-6: Dr. Mark Goldman dba Communication Center of Hawaii;

Exhibit A-7: Ram Paging Hawaii; and

Exhibit A-8: General Telcourier, Inc.

Federal Communications Commission August 5, 1994 Page 3

Thank you for your consideration.

Very truly yours,

Milton Y. Higa

Administrative Director

MYH:eh

**Enclosures** 

# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

---- In the Petition of ----

PUBLIC UTILITIES COMMISSION, STATE OF HAWAII

For Authority to Extend Its Rate Regulation of Commercial Mobile Radio Services in the State of Hawaii. PR 94-103

PR File No.94-SA

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Petitioner, PUBLIC UTILITIES COMMISSION, STATE OF HAWAII (commission) states that:

1. Petitioner's address and telephone number are:

465 South King Street Kekuanaoa Building, # 103 Honolulu, Hawaii 96813 Telephone: (808) 586-2020

2. Communications in regard to this petition are to be addressed to:

Yukio Naito, Chairman Public Utilities Commission State of Hawaii 465 South King Street Kekuanaoa Building, # 103 Honolulu, Hawaii 96813

3. Petitioner requests authorization from the Federal Communications Commission (FCC) to extend its rate regulation of commercial mobile radio services (CMRS) in the State of Hawaii (State). This request is made pursuant to the implementation of sections 3(n) and 332 of the Communications

Act of 1934, as amended by section 6002(b) of the Omnibus Budget Reconciliation Act of 1993 (Budget Act). The Budget Act was signed into law on August 10, 1993. This request is also made in compliance with FCC rules and regulations regarding the regulatory treatment of mobile services cited in 59 FR 18493, section 20.13.

4. Petitioner's interest in the subject matter is its responsibility under the Hawaii Revised Statutes (HRS) to regulate all franchised and certificated public service companies providing telephone and telecommunications services in the State. Petitioner currently regulates five cellular companies and three radio common carriers operating in the State.

The cellular companies are GTE Mobilnet of Hawaii Incorporated (GTE Mobilnet), the only wireline cellular company in the State; USCOC of Hawaii 3, Inc., dba United States Cellular (USCOC); Maui Cellular Telephone Company, Inc. (MCTC); Honolulu Cellular Telephone Company (HCTC); and Cybertel Corporation, dba Cybertel Cellular (Cybertel). See

<sup>&</sup>lt;sup>1</sup>Petitioner was established by Act 89, Session Laws of Hawaii 1913, with broad regulatory oversight and investigative authority over all public utility companies doing business in the Territory of Hawaii. This act, amended over the years and codified in chapter 269 of the HRS, is the basis for utility regulation in the State of Hawaii.

Petitioner is responsible for regulating public service companies that provide electricity, gas, telephone, telecommunication, private water and sewage, and motor and water carrier transportation services in the State.

Attachment 1, "Financial Conditions of Cellular Companies Operating in the State of Hawaii."

The three radio common carriers are Dr. Mark Goldman, dba Island Radio-Phone (Goldman); Ram Paging Hawaii (Ram Paging); and General Telcourier, Inc., dba Pager One, (General Telcourier). See Attachment 2, "Financial Conditions of Radio Common Carriers Operating in the State of Hawaii."

- 5. Petitioner's primary objectives in carrying out its regulatory functions with respect to the five cellular companies and three radio common carriers in the State are (1) to ensure that customers of the CMRS utilities receive adequate and efficient services at reasonable and fair rates, and (2) to provide a fair return to the regulated CMRS utilities. Thus, Petitioner files this petition seeking FCC authorization to extend its rate regulation of CMRS utilities in the State.
- 6. Petitioner believes that it should continue to regulate CMRS rates and tariffs in the State because it is uncertain whether the initial market driven rates that Petitioner approved for the CMRS utilities when they were certificated are currently just and reasonable.

The financial reports filed by the CMRS utilities that have been operating in the State for the past three years reveal that the utilities are generally beginning to experience either an increase in profits and a recovery of their prior accumulated losses or potential profits for the

future. From the outset, the CMRS utilities used market driven rates rather than cost and/or the return on invested capital to structure their rates and tariffs. Petitioner recognizes that these market driven rates may have been reasonable initially when the CMRS utilities considered the interplay of supply and demand factors and various pricing mechanisms to attract consumers to purchase their products and services. However, recent financial data of the majority of the CMRS utilities indicate that these market driven rates may not be reasonable under current conditions, when measured against Petitioner's used and useful criteria for setting rates for regulated utilities.

The data show that the CMRS utilities generally experienced heavy losses during the early years and profitability after three or more years. As the customer base increased, revenues seem to have increased proportionately more than the incremental increase in the associated operating costs and the investment in plant and equipment. By comparison, the increase in the rate of return on the invested plant and equipment has substantially increased over the years, indicating that the return will become greater as more customers subscribe to CMRS.

Petitioner intends to test these market driven rates against the cost of service and the rate of return on rate base to determine whether the current rates and tariffs are excessive, especially where there currently is little or no

competition among CMRS utilities in the State. In order to conduct this review and monitor the operating costs, the rate of return on rate base, and the overall financial condition of each of the CMRS utilities, Petitioner must continue to regulate the utilities' rates and tariffs. Additionally, by regulating the rates, Petitioner will also be able to effectively monitor rate design and structure, as well as the availability and quality of service, since each of the CMRS utilities will be required to appear before Petitioner for all rate case filings.

- 7. Petitioner also believes that it should continue to regulate CMRS rates and tariffs to ensure true competition among CMRS providers, once other companies are licensed by the FCC and certificated by Petitioner to provide commercial mobile radio services in the State, and such companies enter the marketplace. Petitioner believes that such regulatory oversight is necessary whether the tariffs of the CMRS utilities are based on market driven rates or cost and return on invested capital.
- 8. Finally, Petitioner believes that it should, at the very least, continue to regulate CMRS rates and tariffs until the conclusion of its communications infrastructure docket, Docket No. 7702, which was instituted in May 1993 to examine the many complex issues that surround communications technologies and services and to identify the infrastructure necessary to support the deployment and use of the

technologies and services in the State. The regulatory status of the CMRS utilities is part of Docket No. 7702. Petitioner anticipates issuing a final decision and order in Docket No. 7702 in mid-1995.

- 9. Regarding the number of CMRS utilities in the State, the types of services they provide, and the period of time that they have offered services in the State, see Attachments 1 and 2.
- 10. Regarding the number of customers of each CMRS utility in the State, the information is unavailable due to the reluctance of each CMRS utility to provide Petitioner with precise subscriber data in the absence of a guarantee that the information will be protected from disclosure to other CMRS utilities.
- 11. Regarding trends in each CMRS utility's customer base during the most recent annual period or other data covering another reasonable period if annual data is unavailable, and annual revenues and rates of return for each CMRS utility, see Attachments 1 and 2 and Exhibits A-1 through A-8.
- 12. Regarding rate information for each CMRS utility, see Attachment 3. Petitioner did not include trends in each provider's rates during a certain period of time since the CMRS utilities have yet to come before Petitioner for a rate increase.

- 13. Regarding the State's proposed rules should this petition be granted, see Attachment 4, "Standards For Commercial Mobile Radio Service in the State of Hawaii."
- 14. Attachments 1 through 4 and Exhibits A-1 through A-8 provide detailed support for Petitioner's request.
- 15. WHEREFORE, Petitioner requests that it be authorized by the Federal Communications Commission to extend rate regulation of commercial mobile radio services in the State of Hawaii.

# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Petition of
PUBLIC UTILITIES COMMISSION, STATE OF HAWAII
For Authority to Extend Rate Regulation of Commercial Mobile Radio Services in the State of Hawaii.

# CERTIFICATION

I hereby certify that the Public Utilities Commission, State of Hawaii, is the duly authorized state agency responsible for the regulation of telecommunication services provided in the State of Hawaii.

Dated: Honolulu, Hawaii, August 1, 1994.

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| Administrative Diagnose

STATE OF HAWAII  COUNTY OF  SS.
I, Milton Higa, being first duly sworn, deposes and says:
That I am the duly appointed representative of Petitioner in the
above matter, that I have read the foregoing petition, attachments,
and exhibits, and know the contents thereof; and that I am
authorized by the Public Utilities Commission, State of Hawaii, to
verify that the contents of the petition, attachments, and exhibits
are true.
Julian 4 Maye
Subscribed and sworn to before me this
day of, 1994.
Notary Public State of Hawaii

My commission expires:

# Financial Conditions of Cellular Companies Operating in the State of Hawaii

There are a total of five cellular companies operating in the State of Hawaii: one wireline cellular company operating in each county and four nonwireline companies serving the four major islands. The following is a brief summary of the financial condition of each of these cellular companies. Except for HCTC, the summary generally focuses on the years between 1991 and 1993. For HCTC, the financial review was made from 1986 since it was the period in which HCTC experienced its last nonprofitable year.

# A. GTE Mobilnet:

GTE Mobilnet is a Hawaii corporation engaged in wireline cellular telecommunication services on the islands of Hawaii, Maui, Oahu, and Kauai. The FCC and Petitioner granted GTE Mobilnet authorization to operate its cellular services as follows:

Area	<u>FCC</u>	<u>PETITIONER</u>
Honolulu Metropolitan	3/26/84	1/29/86
Island of Kauai	1/89	7/19/86
		9/10/91
Islands of Hawaii and Maui	4/89	12/20/89
		9/10/91

Note:

For the islands of Hawaii, Maui, and Kauai, the first set of Petitioner dates represents interim approvals while the second set of dates represents permanent approvals.

The following data are provided by geographical location. Please note that the cell site and switch equipment data are not currently available. Petitioner plans to obtain the data at a later date. Also, for the neighbor islands, the complete financial data for comparative purposes begin with calendar year 1991.

# 1. Honolulu - Island of Oahu (GTE Mobilnet):

GTE Mobilnet's total net plant and equipment has increased from \$5.5 million in 1986 to \$18.8 million in 1993. In 1986, GTE Mobilnet experienced a pretax net loss of \$1.6 million. In comparison, GTE Mobilnet had a pretax net income of \$935,000 in 1993. The rate of return on the regulated net plant and equipment was approximately 13.8% in 1993 as opposed to negative rates of return in prior years.

GTE Mobilnet's cellular service revenues increased from \$54,000 in 1986 to \$23.8 million in 1993.

# 2. Hilo - Island of Hawaii (GTE Mobilnet Hilo):

GTE Mobilnet Hilo's total net plant and equipment increased from \$1.3 million in 1991 to \$2.7 million in 1993. The pretax rates of return on regulated net plant and equipment for 1991, 1992, and 1993 were a positive 8.25%, a negative 16.29%, and a negative 19.75%, respectively.

Between 1991 and 1993, GTE Mobilnet Hilo's cellular service revenues increased by 42%, from \$814,000 in 1991 to \$1.2 million in 1993.

#### 3. Island of Maui (GTE Mobilnet Maui):

GTE Mobilnet Maui's total net plant and equipment increased from \$1.5 million in 1991 to \$3.1 million in 1993. GTE Mobilnet Maui's financial results for the past three calendar years reflect a profitable operation. The pretax rates of return on regulated net plant and equipment for 1991, 1992, and 1993 were approximately 36.94%, 1.64%, and 5.56%, respectively.

Between 1991 and 1993, GTE Mobilnet Maui's cellular service revenues nearly doubled, from \$1.7 million in 1991 to \$3.3 million in 1993.

#### 4. Island of Kauai (GTE Mobilnet Kauai):

GTE Mobilnet Kauai's total net plant and equipment increased from \$845,000 in 1991 to \$3.8 million in 1993. The pretax rates of return on regulated net plant and equipment for 1991, 1992, and 1993 were a positive 11.12%, a negative 14.21%, and a negative 7.75%, respectively.

Between 1991 and 1993, GTE Mobilnet Kauai's cellular service revenues increased approximately two and a half times, from \$368,000 in 1991 to \$1.3 million in 1993.

# B. USCOC:

USCOC received authorization to operate as a domestic cellular telephone service in the rural service area (RSA) of the island of Hawaii on July 3, 1990.

USCOC's total net plant and equipment increased by 53% or from \$2.2 million in 1991 to \$3.3 million in 1993. The pretax rates of return on regulated net plant and equipment increased from a negative 36.84% in 1991 to a positive 4.19% in 1993.

Between 1991 and 1993, USCOC's cellular service revenues increased more than four times, from \$722,000 in 1991 to \$3.1 million in 1993

#### C. MCTC:

MCTC received authorization to operate as a domestic cellular telephone service in the Maui RSA on December 10, 1990. HCTC was formerly known as Cellular Information Systems of Maui, Inc.

The only financial data currently available for MCTC is for calendar year 1993. The total company net plant and equipment total \$214,000. The pretax rate of return on regulated net plant and equipment was a negative 16.36%.

At the end of 1993, MCTC's cellular service revenues totaled \$114,000.

# D. HCTC:

HCTC is a Hawaii general partnership company formed in 1984 to engage in cellular telecommunication services. In February FCC granted HCTC a construction permit in the Honolulu metropolitan statistical area (MSA) on the island of The commission issued HCTC a certificate of public convenience and necessity (CPCN) on March 14, 1986. cell site and switch equipment have increased approximately 3.5 times, from \$6.1 million in 1986 to \$23.1 million in 1993. For the first year of its operations, HCTC experienced a loss of \$3.2 million and for the next 3 years or until 1988, HCTC continued to experience losses, accumulating a deficit of \$10.2 million. From 1989, HCTC began to earn profits and as of calendar year 1993, HCTC has been in a positive position with cumulative earnings of \$4.1 million. The pretax rate of return on the regulated net plant and equipment has increased from a negative 8.1% to a positive 70.8%.

HCTC's cellular service revenues increased from \$2.0 million in 1986 to \$33.3 million in 1993.

#### E. Cybertel

Cybertel received authorization to operate as a domestic cellular telephone service in the RSA of Kauai on June 14, 1990.

Cybertel's total net plant and equipment increased slightly from \$2.4 million in 1991 to \$2.7 million in 1993. However, the pretax rates of return on regulated net plant and equipment for the three year period increased substantially. For example, the pretax rate of return increased from a negative 46.39% in 1991 to a positive 59.85% in 1993.

Between 1991 and 1993, Cybertel's cellular service revenues increased approximately four times, from \$808,000 in 1991 to \$3.0 million in 1993.

# Financial Conditions of Radio Common Carriers Operating in the State of Hawaii

There are three radio common carriers operating in the State of Hawaii: two are radio common carriers operating statewide and one is a sole proprietor operating on the island of Hawaii. The following is a brief summary of the financial conditions of the radio common carriers between the years 1991 and 1993. For two of the carriers, Ram Paging and General Telcourier, 1993 data are unavailable since they have been granted extensions to file their annual financial reports.

#### A. Goldman:

Goldman is a proprietorship which was granted a CPCN by the commission on November 29, 1979, in Docket No. 3687, Decision and Order No. 5967.

Goldman is a small operator with revenues ranging from \$21,600 in 1991 to \$14,800 in 1993 and net losses for each of the three years 1991, 1992, and 1993. The depreciated equipment amounted to only \$1,400 in 1993.

Goldman's revenues decreased from \$18,900 in 1991 to \$14,800 in 1993.

#### B. Ram Paging:

Ram Paging received authorization to operate as a radio common carrier on the following islands:

Area	Date CPCN Granted
Island of Maui	10/16/80
Islands of Kauai/Oahu	7/16/84
Island of Hawaii	4/28/89

Note:

The CPCN was transferred twice. The first was a transfer from HMH, Inc. to Ram Paging in April 1988. The second was a transfer from Ram Paging to MobileComm of the Northeast, Inc. in July 1994.

As noted earlier, financial data are available for calendar years 1991 and 1992 only. The latest available data for calendar year 1992 reflect the following: total company net plant and equipment of \$8.1 million, total revenues of \$8.0 million, and pretax rates of return on total net plant and equipment of 6.8%.

At the end of 1992, Ram Paging's revenues totaled \$4.5 million.

# C. <u>General Telcourier</u>

General Telcourier received authorization to operate as a radio common carrier on the following islands:

Area	Date CPCN <u>Granted</u>
Island of Oahu	11/30/87
Statewide	4/10/92

As noted earlier, the financial data for 1993 are currently unavailable. For 1991 and 1992, the total company net plant and equipment were \$263,000 and \$241,000, respectively. The pretax rates of return on total net plant and equipment were a negative 64.26% in 1991 and a negative 2.49% in 1992.

GTE Mobilnet of Ha ii Incorporated

P.U. Tariff No. 1
Original Sheet 23

# RETAIL CELLULAR TELECOMMUNICATIONS SERVICE

# J. Rate Periods and Timing of Calls (continued)

- Timing of Calls (continued)
  - b. Usage charges for calls received by a Cellular Telephone begin when the call is answered and end when the Cellular Telephone disconnects.
  - c. Usage on each call is rounded up to the next minute for billing purposes.
  - d. When a connection is established in one rate period and ends in another, the rate in effect for each period applies to the portion of the connection occurring within each rate period.

#### K. Rates and Charges

1. Service Order Charge

To activate, restore or change an Access Number, or to add or modify call restriction features; per Access Number affected:

\$25.00

Issued: MAY 2 3 1986 Effective: JUN 0 1 1986

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#### RETAIL CELLULAR TELECOMMUNICATIONS SERVICE

# K. Rates and Charges (continued)

2. Access and Usage Packages

Eight packages are available which permit a Customer to select a monthly access rate and associated per-minute Usage rate(s).

Option l (Available only to Customers who are subscribing to this option before

Access to the Cellular Telephone
System; per month: \$25.00

Peak Period Usage

Rate
Per
Minute

First 100 minutes

Next 200 minutes

\$ 0.49

All additional minutes

\$ 0.39

Each minute of Usage during
Off-Peak Periods: \$ 0.20

b. Option 2 (Available only to Customers who are subscribing to this option before )

Access to the Cellular Telephone
System; per month:

No Charge \*

Each minute of Usage during
Peak Periods: \$ 0.75

Each minute of Usage during
Off-Peak Periods: \$ 0.20

\* The minimum monthly charge for service under Option 2 is \$15.00.

Issued: August 4, 1992 Effective: October 9, 1992

By: Anita Seyer

Area Manager - GTE Mobilnet of Hawaii Incorporated

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# RETAIL CELLULAR TELECOMMUNICATIONS SERVICE

- K. Rates and Charges (continued)
  - 2. Access and Usage Packages (continued)
    - c. Single User Contract (Available to all Customers)

Access to the Cellular Telephone System; per month	No Charge*
Peak Period Usage	Rate Per Minute
First 96 minutes Next 4 minutes Next 200 minutes All additional minutes	\$ 0.75 \$ 0.49 \$ 0.44 \$ 0.39
Each minute of Usage during Off-Peak Periods:	\$ 0.17

d. Multi-User Contract (Available to all Customers)

Access to the Cellular
Telephone System; per month;
per Access Number \$25.00

Peak Period Usage:

First 100 minutes		0.49
Next 200 minutes		0.44
All additional minutes		0.39
Each minute of Usage during Off-Peak Periods:	\$	0.17

Usage will be added together

for all numbers before being rated

\* The minimum monthly charge for service under the Single User Contract is \$15.00.

Issued: August 4, 1992 Effective: October 9, 1992

By: Anita Seyer

Area Manager - GTE Mobilnet of Hawaii Incorporated

\$ 25.00

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tz.	Datos	and	Chargos	(continued)
Κ.	Rates	and	Charges (	(continued)

- 2. Access and Usage Packages (continued)
  - (e) <u>Convenience Plan</u>. (Appropriate for Customers who have up to 75 minutes Usage each month) (Available to all Customers)
  - (1) Activation Fee: To activate, restore or change an Access Number, or to add or modify call restriction features; per Access Number affected:
  - (2) Access Charge: Access to the Cellular Telephone System which includes 25 minutes of Usage; per month; per Access Number: \$ 15.00
  - (3) Peak Period Usage, Per Minute \$ .75
  - (4) Off-Peak Period Usage, Per Minute: \$ 0.17

Issued: August 4, 1992 Effective: October 9, 1992

By: Anita Seyer
General Manager - GTE Mobilnet of Hawaii Incorporated

K. Rates and Charges (continued)

- 2. Access and Usage Packages (continued)
  - (f) Occasional User Plan (Appropriate for customers who have between 76 199 minutes of Usage each month) (Available to all Customers)
    - (1) Activation Fee: To activate, restore or change an Access Number, or to add or modify call restriction features; per Access Number affected:

\$ 25.00

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(2) Access Charge: Access to the Cellular Telephone System which includes 75 minutes of Usage; per month: per Access Number:

\$ 42.00

(3) Peak Period Usage, Per Minute

.65

(4) Off-Peak Period Usage, Per Minute:

\$ 0.17

Issued: August 4, 1992 Effective: October 9, 1992

By: Anita Seyer

General Manager - GTE Mobilnet of Hawaii Incorporated

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- K. Rates and Charges (continued)
  - 2. Access and Usage Packages (continued)
    - (g) Moderate User Plan (Appropriate for customers who have between 200 399 minutes of Usage each month) (Available to all Customers)
      - (1) Activation Fee: To activate,
        restore or change an Access Number,
        or to add or modify call
        restriction features; per Access
        Number affected: \$ 25.00
      - (2) Access Charge: Access to the Cellular Telephone System which includes 200 minutes of Usage; per month; per Access Number: \$ 99.00
      - (3) Peak Period Usage, Per Minute \$ .44
      - (4) Off-Peak Period Usage, Per Minute: \$ 0.17

Issued: August 4, 1992 Effective: October 9, 1992

By: Anita Seyer
General Manager - GTE Mobilnet of Hawaii Incorporated

K. Rates and Charges (continued)

- 2. Access and Usage Packages (continued)
  - (h) High Volume User Plan. (Appropriate for customers who have 400 or more minutes of Usage each month) (Available to all Customers)
    - (1) Activation Fee: To activate, restore or change an Access Number, or to add or modify call restriction features; per Access Number:
    - (2) Access Charge: Access to the Cellular Telephone System which includes 400 minutes of Usage; per month; per Access Number: \$165.00
    - (3) <u>Peak Period Usage</u>, <u>Per Minute</u> \$ .39
    - (4) Off-Peak Period Usage, Per Minute: \$ 0.17

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\$ 25.00

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Issued: August 4, 1992 Effective: October 9, 1992

By: Anita Seyer

General Manager - GTE Mobilnet of Hawaii Incorporated